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**Banking
with a
Christian
Organization**

- ◆ Proposed Rule for FDICIA Disclosures, Matter No. R411014
Federal Trade Commission/ Office of the Secretary
Room H-159 (Annex A)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Secretary:

I am writing in opposition to your agency's proposed rule governing consumer disclosure requirements for privately insured credit unions; specifically, as they affect signage on ATMs.

The Christian Community Credit Union, a state-chartered credit union in the state of California has been privately insured since February, 1999 and has been serving the members of American Baptist Churches, North American Baptist Churches, International Churches of the Foursquare Gospel and mission organizations throughout the United States since 1957. Our credit union has 27,670 members comprising \$357,169,946 in total share/deposit accounts. We are a full-service financial institution offering a wide variety of services; one of which is providing members access to their deposit accounts through ATMs.

We are fully aware of the statutory disclosure language contained in the FDIC Improvement Act of 1991, and the fact that we are required to post signage in our lobbies and places where deposits are normally received stating that our credit union is not federally insured. We believe we are in compliance with such statutory requirements. However, we must take exception to your proposed rule Section 320.4(a) requiring this disclosure signage be posted on our ATMs.

The credit union currently is in the construction phase of our two branches and will have the ATMs strategically located in various small employer facilities and other public venues for consumer convenience. We are also a member of the Co-op Network a privately held company with 19,980 total participating member/owners. As a member/owner in this ATM network, we are required by contract to allow customers of all participating financial institutions access to their funds through ATMs owned by us. Most member organizations are federally insured. To post a sign on our ATMs indicating that our credit union is not federally insured would clearly confuse the customers of these other participating institutions when using our machines. This provision of the proposed rule is anti-consumer in nature and defeats the true intent of the law to broaden consumer awareness.

Since our members already receive a wide variety of disclosures regarding the lack of federal insurance through other means, to require postings on our ATMs creates significant confusion and could cause us to be expelled from the network. If this were to occur as a result of the posting of a required disclosure, we would be forced to eliminate a service otherwise available to members of federally insured credit unions and it would impede consumer access to their funds. This is counterproductive and anti-competitive.

As an alternative, we would propose that the posted signage be required only on ATMs owned by a privately insured credit union, and only on those machines physically located inside the main or branch offices of a privately insured credit union.

Thank you for considering our disagreement with this provision of the proposed rule.

Respectfully submitted,

John T. Walling
President/CEO